

# EXHIBIT B

---

**From:** John Reckenbeil <john@johnreckenbeillaw.com>  
**Sent:** Monday, August 29, 2022 1:34 PM  
**To:** Nelson, Luci L.  
**Cc:** Keri Armstrong; Cuttino, Ashley P.  
**Subject:** Re: Shannon Kneece - Arbitration Agreement

**[Caution: Email received from external source]**

---

Luci,

As looking right now, my client is still adamant she did not ensign, nor ever rec'd Arbitration Agreement.

Thus I'm going have to contest the mandatory arbitration agreement.

Is it....You all will move for the arbitration and then I'll have to file in opposition?

John

John G. Reckenbeil, Esq.

LAW OFFICE OF JOHN G. RECKENBEIL, LLC

Physical Address:

114 Renaissance Circle

Mauldin, SC 29662

Mailing Address:

P.O. Box 314

Mauldin, SC 29662

Phone (864) 248-0436

Fax (864) 326-5940

Website: [www.johnreckenbeillaw.com](http://www.johnreckenbeillaw.com)

**CONFIDENTIALITY NOTICE:** This e-mail message is intended only for the personal and confidential use of the designated recipient(s) named above and may contain work product and/or attorney-client information, which is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not a named recipient, **YOU ARE HEREBY NOTIFIED** that any review, dissemination, distribution, disclosure or copying of this message and/or attachments is **STRICTLY PROHIBITED**. If you have received this e-mail message in error, please notify us immediately at the telephone number listed above to arrange for the return and/or deletion of the original message. Thank you for your cooperation.

On Mon, Aug 29, 2022 at 10:43 AM Nelson, Luci L. <[luci.nelson@ogletree.com](mailto:luci.nelson@ogletree.com)> wrote:

Thank you, John. Will you please let me know whether Ms. Kneece will consent to the arbitration or whether we need to start putting together the motion to compel?

Thank you.

**Luci L. Nelson | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

The Ogletree Building, 300 North Main Street, Suite 500 | Greenville, SC 29601 | Telephone: 864-271-1300 | Mobile: 864-430-5907

[luci.nelson@ogletreedekins.com](mailto:luci.nelson@ogletreedekins.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

**From:** John Reckenbeil <[john@johnreckenbeillaw.com](mailto:john@johnreckenbeillaw.com)>

**Sent:** Thursday, August 25, 2022 10:17 AM

**To:** Nelson, Luci L. <[Luci.Nelson@OgletreeDeakins.com](mailto:Luci.Nelson@OgletreeDeakins.com)>

**Cc:** Keri Armstrong <[keri@johnreckenbeillaw.com](mailto:keri@johnreckenbeillaw.com)>; Cuttino, Ashley P.

<[Ashley.Cuttino@ogletreedekins.com](mailto:Ashley.Cuttino@ogletreedekins.com)>

**Subject:** Re: Shannon Kneece - Arbitration Agreement

**[Caution: Email received from external source]**

---

Luci,

I added my S/ name to the bottom. I think this is what you needed me to do...

If I screwed it up, delete what I did.

You all have my permission to file and the extension request.

John

John G. Reckenbeil, Esq.

LAW OFFICE OF JOHN G. RECKENBEIL, LLC

Physical Address:

114 Renaissance Circle

Mauldin, SC 29662

Mailing Address:

P.O. Box 314

Mauldin, SC 29662

Phone (864) 248-0436

Fax (864) 326-5940

Website: [www.johnreckenbeillaw.com](http://www.johnreckenbeillaw.com)

**CONFIDENTIALITY NOTICE:** This e-mail message is intended only for the personal and confidential use of the designated recipient(s) named above and may contain work product and/or attorney-client information, which is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not a named recipient, **YOU ARE HEREBY NOTIFIED** that any review, dissemination, distribution, disclosure or copying of this message and/or attachments is **STRICTLY PROHIBITED**. If you have received this e-mail message in error, please notify us immediately at the telephone number listed above to arrange for the return and/or deletion of the original message. Thank you for your cooperation.

On Thu, Aug 25, 2022 at 9:57 AM Nelson, Luci L. <[luci.nelson@ogletree.com](mailto:luci.nelson@ogletree.com)> wrote:

Thank you. Please see the attached proposed motion and order. If this meets with John's approval, we will s/ and file today.

**Luci L. Nelson | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

The Ogletree Building, 300 North Main Street, Suite 500 | Greenville, SC 29601 | Telephone: 864-271-1300 | Mobile: 864-430-5907

[luci.nelson@ogletreedeakins.com](mailto:luci.nelson@ogletreedeakins.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

**From:** Keri Armstrong <[keri@johnreckenbeillaw.com](mailto:keri@johnreckenbeillaw.com)>

**Sent:** Thursday, August 25, 2022 9:53 AM

**To:** Nelson, Luci L. <[Luci.Nelson@OgletreeDeakins.com](mailto:Luci.Nelson@OgletreeDeakins.com)>

**Cc:** John Reckenbeil <[john@johnreckenbeillaw.com](mailto:john@johnreckenbeillaw.com)>; Cuttino, Ashley P.

<[Ashley.Cuttino@ogletreedeakins.com](mailto:Ashley.Cuttino@ogletreedeakins.com)>

**Subject:** Re: Shannon Kneece - Arbitration Agreement

**[Caution: Email received from external source]**

---

Hi Luci,

John says the extension is fine. Thanks!

Keri E. Armstrong

Paralegal to John G. Reckenbeil, Esq.

LAW OFFICE OF JOHN G. RECKENBEIL, LLC

Physical Address:

114 Renaissance Circle

Mauldin, SC 29662

Mailing Address:

P.O. Box 314

Mauldin, SC 29662

Phone (864) 248-0436

Fax (864) 326-5940

Website: [www.johnreckenbeillaw.com](http://www.johnreckenbeillaw.com)

**CONFIDENTIALITY NOTICE:** This e-mail message is intended only for the personal and confidential use of the designated recipient(s) named above and may contain work product and/or attorney-client information, which is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not a named recipient, **YOU ARE HEREBY NOTIFIED** that any review, dissemination, distribution, disclosure or copying of this message and/or attachments is **STRICTLY PROHIBITED**. If you have received this e-mail message in error, please notify us immediately at the telephone number listed above to arrange for the return and/or deletion of the original message. Thank you for your cooperation.

On Wed, Aug 24, 2022 at 4:53 PM Nelson, Luci L. <[luci.nelson@ogletree.com](mailto:luci.nelson@ogletree.com)> wrote:

Hi, John.

Following up on the below. I would like to go ahead and file a motion for extension of time on our responsive pleading deadline, seeking 3 additional weeks, until September 16<sup>th</sup>, while we work through this arbitration agreement issue. Would you be amenable to such a motion? If so, I'll go ahead and draft it, as well as a proposed order, for your review.

Thank you.

**Luci L. Nelson | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

The Ogletree Building, 300 North Main Street, Suite 500 | Greenville, SC 29601 | Telephone: 864-271-1300 | Mobile: 864-430-5907

[luci.nelson@ogletreedekins.com](mailto:luci.nelson@ogletreedekins.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

---

**From:** Nelson, Luci L.

**Sent:** Wednesday, August 24, 2022 10:33 AM

**To:** John Reckenbeil <[john@johnreckenbeillaw.com](mailto:john@johnreckenbeillaw.com)>

**Cc:** Cuttino, Ashley P. <[Ashley.Cuttino@ogletreedekins.com](mailto:Ashley.Cuttino@ogletreedekins.com)>

**Subject:** RE: Shannon Kneece - Arbitration Agreement

Hi, John. As requested, here is a screenshot of the email telling Ms. Kneece to log into the portal to start the onboarding process (a part of which was the acknowledgement of the arbitration agreement).

At this point, our answer/motion is due on Friday, 8/26. Please let me know if you will voluntarily consent to transferring the matter to arbitration, as I will need to file something with the court on or before Friday (even if it is just a request for an extension of time at this point).

Thank you.

**Email History - View Message Details**

**Header**

Author: Syneos Health HR North America

Emailed Date: 3/8/2021 9:31 PM

To: shannonkneece@gmail.com

Subject: Welcome to Syneos Health!

**Email Body**

Dear Shannon,

Congratulations on your offer with Syneos Health! In order to start the hiring process, we need you to click the link below to confirm and update your information.



Please let us know if you have any questions at all!

Syneos Health HR Support Services

[https://careers.peopleclick.eu.com/careerscp/Client\\_SyneosHealth/external/en-us/gateway/questFromLink.html?IR=iHyq8SBzTXNlsHyHMuwIyML8m0W4WCj1aer1tD0o1jfmKkKg372yqxAo1Qq2SHOg](https://careers.peopleclick.eu.com/careerscp/Client_SyneosHealth/external/en-us/gateway/questFromLink.html?IR=iHyq8SBzTXNlsHyHMuwIyML8m0W4WCj1aer1tD0o1jfmKkKg372yqxAo1Qq2SHOg)

**Attachments**

Name	Type	File Size (bytes)
------	------	-------------------



**Luci L. Nelson | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

The Ogletree Building, 300 North Main Street, Suite 500 | Greenville, SC 29601 | Telephone: 864-271-1300 | Mobile: 864-430-5907

[luci.nelson@ogletreedekins.com](mailto:luci.nelson@ogletreedekins.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

**From:** John Reckenbeil <[john@johnreckenbeillaw.com](mailto:john@johnreckenbeillaw.com)>

**Sent:** Tuesday, August 16, 2022 4:42 PM

**To:** Nelson, Luci L. <[Luci.Nelson@OgletreeDeakins.com](mailto:Luci.Nelson@OgletreeDeakins.com)>

**Subject:** Re: Shannon Kneece - Arbitration Agreement

**[Caution: Email received from external source]**

---

so sorry my phones are hooked to internet and internet went out. Been having real problem with Internet the last couple weeks.

Just get me what you can on out going email we discussed

John G. Reckenbeil, Esq.

LAW OFFICE OF JOHN G. RECKENBEIL, LLC

Physical Address:

114 Renaissance Circle

Mauldin, SC 29662

Mailing Address:

P.O. Box 314

Mauldin, SC 29662

Phone (864) 248-0436

Fax (864) 326-5940

Website: [www.johnreckenbeillaw.com](http://www.johnreckenbeillaw.com)

**CONFIDENTIALITY NOTICE:** This e-mail message is intended only for the personal and confidential use of the designated recipient(s) named above and may contain work product and/or attorney-client information, which is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not a named recipient, **YOU ARE HEREBY NOTIFIED** that any review, dissemination, distribution, disclosure or copying of this message and/or attachments is **STRICTLY PROHIBITED**. If you have received this e-mail message in error, please notify us immediately at the telephone number listed above to arrange for the return and/or deletion of the original message. Thank you for your cooperation.

On Tue, Aug 16, 2022 at 3:24 PM Nelson, Luci L. <[luci.nelson@ogletree.com](mailto:luci.nelson@ogletree.com)> wrote:

John,

As requested, here is a screenshot of the computer program in which Ms. Kneece received and accepted the arbitration agreement.

**Welcome, Jessica** [Preferences](#)  
 Organization: Syneos Health Product: Onboarding

**My Peoplefluent** **Engagements** **Tasks** **Process Metrics/Reporting**

**New hire profile :**

**Task List**

Action

Listing records 1 - 6 of 9

<input type="checkbox"/>	Type	Task Name
<input type="checkbox"/>		2020 Be
<input type="checkbox"/>		2020 Re
<input type="checkbox"/>		CEO We
<input type="checkbox"/>		Janssen
<input type="checkbox"/>		Syneos
<input type="checkbox"/>		Syneos

**Basic Information**

Full Name:  
 Preferred Name:  
 First Name:  
 Last Name:  
 Position Title:  
 Employee ID:  
 Internal Hire:  
 Internal Manager Phone:  
 Requisition Created On:

**View Task**

Task Name: Syneos Health Arbitration Agreement  
 Task Owner: Gatica Martin  
 Task Description: Please click the link to complete the Health Arbitration Agreement  
 Dependency: None  
 Task Status: In Progress  
 Add Task Only If: None  
 Task Due Date: 08/03/2021  
 Send Task Assignment Notification: False  
 Send Reminder Notification: False  
 Task Reminder Date: 0  
 Notify Onboarding Manager on Completion: False  
 Attachments: None  
 Interactive Documents: None  
 Information Documents: Mutual Arbitration Agreement for US  
 Ad Hoc Documents: None  
 Complete and Validate fields on New Hire Profile: None

New Hire Profile: Kneece , Shannon Start Date : 22/03/20

**Task History**

Listing records 1 - 6 of 9

Previous Status	New Status	Time Stamp	Comments
In Progress	In Progress	09/03/2021 11:06 AM	Onboarding
In Progress	In Progress	09/03/2021 11:06 AM	Task Creat
In Progress	In Progress	09/03/2021 11:06 AM	Task Accep
In Progress	Submitted	09/03/2021 02:34 PM	Task Subm
Submitted	Completed	09/03/2021 02:34 PM	Task Comp
Completed	Completed	17/03/2022 07:43 AM	Task Reas

**Luci L. Nelson | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

The Ogletree Building, 300 North Main Street, Suite 500 | Greenville, SC 29601 | Telephone: 864-271-1300 | Mobile: 864-430-5907

[luci.nelson@ogletreedeakins.com](mailto:luci.nelson@ogletreedeakins.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)

**From:** John Reckenbeil <[john@johnreckenbeillaw.com](mailto:john@johnreckenbeillaw.com)>  
**Sent:** Wednesday, August 10, 2022 3:26 PM  
**To:** Nelson, Luci L. <[Luci.Nelson@OgletreeDeakins.com](mailto:Luci.Nelson@OgletreeDeakins.com)>; Keri Armstrong <[keri@johnreckenbeillaw.com](mailto:keri@johnreckenbeillaw.com)>  
**Cc:** Cuttino, Ashley P. <[Ashley.Cuttino@ogletreedekins.com](mailto:Ashley.Cuttino@ogletreedekins.com)>  
**Subject:** Re: Shannon Kneece - Arbitration Agreement

**[Caution: Email received from external source]**

---

Luci,

Do you all have a copy of the email and/or the computer program in which Syneos would have sent Ms. Kneece the Arbitration Agreement March 9th 2021?

John

John G. Reckenbeil, Esq.

LAW OFFICE OF JOHN G. RECKENBEIL, LLC

Physical Address:

114 Renaissance Circle

Mauldin, SC 29662

Mailing Address:

P.O. Box 314

Mauldin, SC 29662

Phone (864) 248-0436

Fax (864) 326-5940

Website: [www.johnreckenbeillaw.com](http://www.johnreckenbeillaw.com)

**CONFIDENTIALITY NOTICE:** This e-mail message is intended only for the personal and confidential use of the designated recipient(s) named above and may contain work product and/or attorney-client information, which is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not a named recipient, **YOU ARE HEREBY NOTIFIED** that any review, dissemination, distribution, disclosure or copying of this message and/or attachments is **STRICTLY PROHIBITED**. If you have received this e-mail message in error, please notify us immediately at the telephone number listed above to arrange for the return and/or deletion of the original message. Thank you for your cooperation.

On Mon, Aug 1, 2022 at 2:37 PM Nelson, Luci L. <[luci.nelson@ogletree.com](mailto:luci.nelson@ogletree.com)> wrote:

John,

Good afternoon. I am working with Ashley Cuttino on the Shannon Kneece v. Syneos Health matter. As requested, attached for your consideration is the arbitration agreement signed by Ms. Kneece.

I look forward to working with you on this case.

**Luci L. Nelson | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.**

The Ogletree Building, 300 North Main Street, Suite 500 | Greenville, SC 29601 | Telephone: 864-271-1300 | Mobile: 864-430-5907

[luci.nelson@ogletreedekins.com](mailto:luci.nelson@ogletreedekins.com) | [www.ogletree.com](http://www.ogletree.com) | [Bio](#)